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8 Counsel for Lead Plaintiffs and the Class

9 UNITED STATES DISTRICT COURT
10 CENTRAL DISTRICT OF CALIFORNIA
11 WESTERN DIVISION

12 BYRON BROWN, TIANQING ZHANG,
13 AND ROBERTO SALAZAR,
14 INDIVIDUALLY AND ON BEHALF OF
15 ALL OTHERS SIMILARLY SITUATED,

16 Plaintiffs,

17 vs.

18 AMBOW EDUCATION HOLDING LTD.,
19 JIN HUANG, PAUL CHOW, XUEJUN
20 XIE, MARK ROBERT HARRIS, LISA LO,
21 DANIEL PHILLIPS, TAO SUN AND
22 SASHA CHANG

23 Defendants.

CASE No.: 12-cv-5062 PSG
(AJW)

CLASS ACTION

**NOTICE OF MOTION AND
MOTION FOR ENTRY OF
ORDER PRELIMINARY
APPROVING SETTLEMENT
AND ESTABLISHING
NOTICE PROCEDURES**

Date: December 8, 2014

Time: 1:30 p.m.

Courtroom: 880

Judge: Hon. Philip S. Gutierrez

1 **PLEASE TAKE NOTICE** that on December 8 ,2014, at 1:30 p.m., Lead
2 Plaintiff Tianqing Zhang and Named Plaintiffs Byron Brown and Roberto Salazar
3 (“Plaintiffs”) will move this Court, the Honorable Philip S. Gutierrez, United
4 States District Judge of the United States District Court for the Central District of
5 California, Edward R. Roybal Federal Courthouse, 255 East Temple Street,
6 Courtroom 880 – 8th floor, for entry of an Order (a) preliminarily approving the
7 settlement between Plaintiffs and Defendants; (b) certifying a Class for settlement
8 purposes only (c) approving the notice to the Class of the Proposed Settlement, in
9 substantially the same form as the Notice of Proposed Settlement of Class Action;
10 and (d) scheduling a final approval hearing for a date at the Court's convenience.
11 The Defendants do not oppose the relief requested by this motion.

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13 Dated: October 24, 2014

Respectfully submitted,

14 **THE ROSEN LAW FIRM, P.A.**

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CERTIFICATE OF SERVICE

I, Laurence M. Rosen, hereby declare under penalty of perjury as follows:

I am the managing attorney of the Rosen Law Firm, P.A., with offices at 355 South Grand Avenue, Suite 2450, Los Angeles, CA 90071. I am over the age of eighteen.

On October 24, 2014 I caused to be electronically filed the following

**NOTICE OF MOTION AND MOTION FOR ENTRY OF ORDER
PRELIMINARILY APPROVING SETTLEMENT AND ESTABLISHING
NOTICE PROCEDURES**

with the Clerk of the Court using the CM/ECF system which sent notification of such filing to counsel of record.

Executed on October 24, 2014

/s/ Laurence Rosen

Laurence M. Rosen